REMARKS

The only issue raised by the June 17, 2005 Office Action is that claims 1-23 stand rejected under 35 U.S.C. 102(e) as anticipated by Bolt, U.S. Pat. No. 6,725,394 (hereinafter *Bolt*). Applicant hereby traverses the outstanding rejections of the claims, and requests reconsideration and withdrawal of the outstanding rejections in light of the remarks contained herein. Claims 1-23 are currently pending in this application.

The recited reference does not teach all claimed elements.

It is well settled that to anticipate a claim under 35 U.S.C. § 102, a reference must teach every element of the claim, see M.P.E.P. §2131. Moreover, in order for a reference to be anticipatory under 35 U.S.C. §102 with respect to a claim, "[t]he elements must be arranged as required by the claim," see M.P.E.P. § 2131, citing *In re Bond*, 15 US.P.Q.2d 1566 (Fed. Cir. 1990). Furthermore, in order for a reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim," see M.P.E.P. § 2131, citing *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989). Applicant respectfully asserts that the rejections do not satisfy one or more of these requirements, as detailed below.

Claims 1-9 and 23

Independent claims 1 and 23 recite a controller comprising non-volatile memory storing "code... operable to associate each device identifier of said multiple device identifiers with at least one respective library partition." *Bolt* fails to disclose at least these elements.

The Office Action cites column 10, lines 4 et seq. as disclosing code operable to associate each device identifier of the multiple device identifiers with at least one respective library partition. However, *Bolt* is silent concerning library partitions, much less associating each of multiple device identifiers with a respective library partition. *Bolt* only discusses reserving one or more drives as spare data storage drives and masking the spare data storage drives from host computers to make them inaccessible by the host computers. See the Abstract of *Bolt*. Regardless, the portion of *Bolt* cited by the Office Action discusses the use of FC to SCSI bridges and a host system acting as an "initiator" and the library as a series of "targets." Even if target SCSI IDs discussed in lines 9-16 of column 10 are assumed, *ad*

arguendo, to correspond to device identifiers, nothing in *Bolt* discloses associating each SCSI ID with a respective library partition. Thus, *Bolt* does not teach the claimed "code operable to associate each device identifier of the multiple device identifiers with at least one respective library partition."

For at least the above reasons, independent claims 1 and 23 are patentable over the 35 U.S.C. § 102 rejections of record. Furthermore, there are great differences between claim 1 and the art of record, as well as claim 23 and the art of record. A person of ordinary skill in the art considering the prior art would not find these differences obvious.

Claims 2-9 ultimately depend from independent claim 1, and thus each of claims 2-9 inherit all elements of claim 1. Therefore, for at least the reasons advanced above in addressing the anticipation rejection of claim 1, each of claims 2-9 sets forth features and elements not recited by *Bolt*. Accordingly, Applicant respectfully asserts that claims 2-9 are also patentable over the 35 U.S.C. § 102 rejections of record.

Claims 10-16

Independent claim 10 recites

> assigning resources of said moveable media library to partitions of a plurality of partitions;
>
> assigning at least one partition of said plurality of partitions to each communication medium identifier of a plurality of communication medium identifiers; and
>
> determining a partition of said plurality of partitions utilizing said one of said plurality of communication medium identifiers.

Bolt does not disclose at least these elements.

As noted above, *Bolt* is silent concerning library partitions, much less "assigning resources of said moveable media library to partitions of a plurality of partitions," as recited by independent claim 10. *Bolt* only discusses reserving one or more drives as spare data storage drives and masking the spare data storage drives from host computers to make them inaccessible by the host computers. See the Abstract of *Bolt*. The Office Action cites column

2, line 20, as teaching "assigning resources of said moveable media library to partitions of a plurality of partitions." However, this portion of *Bolt* only discusses the "digital data storage unit includes a multiplicity of storage media slots for receiving media storage units." In other words, this portion of *Bolt* only teaches that a library includes slots that hold storage media, such as tapes. For at least the foregoing reasons, *Bolt* fails to teach claim 10 element "assigning resources of said moveable media library to partitions of a plurality of partitions."

Whereas *Bolt* fails to teach "assigning resources of said moveable media library to partitions of a plurality of partitions," it follows that *Bolt* cannot teach "assigning at least one partition of said plurality of partitions to each communication medium identifier," as also recited by claim 10. The Office Action cites column 6, lines 39 et seq., as teaching assigning at least one partition to each communication medium identifier. However, Applicant respectfully points out that the cited portion of *Bolt* only teaches assignment of an SCSI ID and/or LUN suffixes to "targets," such as tape drives, within the library. Even if target SCSI IDs are assumed, *ad arguendo*, to correspond to some sort of identifier, nothing in *Bolt* teaches assigning a partition to each of a plurality of communication medium identifiers. For at least these reasons, *Bolt* also fails to teach "assigning at least one partition of said plurality of partitions to each communication medium identifier of a plurality of communication medium identifiers," as recited by independent claim 10.

As noted, independent claim 10 as recites "determining a partition of said plurality of partitions utilizing said one of said plurality of communication medium identifiers." Again, since *Bolt* is silent concerning partitions, it seems that *Bolt* cannot teach determining a partition utilizing one of said plurality of communication medium identifiers. The Office Action cites, column 7, lines 10-43 of *Bolt* as teaching this element of claim 10. However the cited portion of *Bolt* only discusses transferring a tape cartridge from a slot to a host-selected drive (lines 32-33) and back to a slot (lines 41-43). Thus, for at least the above reasons *Bolt* also fails to teach "determining a partition of said plurality of partitions utilizing said one of said plurality of communication medium identifiers, " as recited by independent claim 10.

For at least for the above reasons, independent claim 10 is patentable over the 35 U.S.C. § 102 rejection of record. Furthermore, there are great differences between claim 10

and the art of record, and a person of ordinary skill in the art considering the prior art would not find these differences obvious.

Claims 11-16 ultimately depend from independent claim 10, and thus each of claims 11-16 inherit all elements of claim 10. Therefore, for at least the reasons advanced above in addressing the anticipation rejection of claim 10, each of claims 11-16 sets forth features and elements not recited by *Bolt*. Accordingly, Applicant respectfully asserts that claims 11-16 are also patentable over the 35 U.S.C. § 102 rejections of record.

Claims 17-22

Independent claim 17 recites a robotics controller that includes "code for determining a partition of a plurality of partitions utilizing said communication medium identifier" and "code for controlling said robotics subsystem utilizing at least said determined partition." *Bolt* does not disclose at least these elements.

The Office Action cites column 12, lines 66-67 and column 10, lines 4 et seq. of *Bolt* as disclosing these elements. Neither the portions of *Bolt* cited by the Office Action, nor other portions of *Bolt*, appear to disclose the above-quoted elements Column 12, lines 66-67, of *Bolt* describes operation of a bridge (25) and CPU (25A) of that bridge, not controller 146 as indicated by the Office Action. Regardless, *Bolt* is silent concerning library partitions, much less determining a partition of a plurality of partitions utilizing a communication medium identifier from a command addressed with the communication medium identifier, as claimed in claim 17. Column 10, lines 4 et seq. of *Bolt* discusses the use of FC to SCSI bridges and a host system acting as an "initiator" and the library as a series of "targets." Even if target SCSI IDs discussed in lines 9-16 of column 10 are assumed, *ad arguendo*, to correspond to device identifiers, nothing in *Bolt* discloses determining a partition utilizing an SCSI ID or controlling library robotics subsystem utilizing partitions.

For at least for the above reasons, independent claim 17 is patentable over the 35 U.S.C. § 102 rejection of record. Furthermore, there are great differences between claim 17 and the art of record, and a person of ordinary skill in the art considering the prior art would not find these differences obvious.

Claims 18-22 ultimately depend from independent claim 17, and thus each of claims 18-22 inherit all elements of claim 17. Therefore, for at least the reasons advanced above in addressing the anticipation rejection of claim 17, each of claims 18-22 sets forth features and elements not recited by *Bolt*. Therefore, Applicant respectfully asserts that claims 18-22 are also patentable over the 35 U.S.C. § 102 rejections of record.

Conclusion

For all the reasons given above, Applicant submits that the pending claims distinguish over the prior art under 35 U.S.C. § 102. Accordingly, Applicant submits that this application is in full condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 08-2025, under Order No. 30008195-1, from which the undersigned is authorized to draw.

Applicant respectfully requests that the Examiner call the below listed attorney if the Examiner believes that the attorney can helpful in resolving any remaining issues or can otherwise be helpful in expediting prosecution of the present application.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV 482713307US in an envelope addressed to: M/S Amendment, Commissioner for Patents, Alexandria, VA 22313.

Date of Deposit: September 19, 2005

Typed Name: Gail L. Miller

Signature: Gail L. Miller

Respectfully submitted,

By: _____

Jerry L. Mahurin
Attorney/Agent for Applicant(s)
Reg. No. 34,661
Date: September 19, 2005
Telephone No. (214) 855-8386